


Serving Private School Students, Teachers, and Families

Arizona Department of Education
Academic Achievement
Gary Fortney



SERVING PRIVATE SCHOOL STUDENTS

Objectives

To address some specific repeated issues and questions about services to private school students (not comprehensive review)

To address evaluation of private school students

To address third party providers

To address Title II professional development

PROGRAMS THAT REQUIRE EQUITABLE PRIVATE SCHOOL SERVICES

Title I - Improving the Academic Achievement of the Disadvantaged

- Improving Basic Programs Operated by LEAs (**Not governed by Title IX, Uniform Provisions**)
- Education of Migratory Children (Federal Monitoring)

Title II - Preparing, Training and Recruiting High Quality Teachers and Principals

Title III - Language Instruction for LEP and Immigrant Students

- English Language Acquisition, Language Enhancement, and Academic Achievement Act

Title IV - 21st Century Schools

IDEA

SERVING PRIVATE SCHOOL STUDENTS

Reminders

Services are to be offered to students, their teachers, and their families...NOT to private schools.

Services are provided because that private school child might attend public school and receive services.

For Title I, all students who reside within attendance area are eligible whether or not they attend a private school within attendance area.

SERVING PRIVATE SCHOOL STUDENTS



GME (Grants Management Enterprise System) and
Cycle 4 Monitoring making services to eligible
students attending private schools more accountable

ESEA Application on GME

Title I
Instruction (PPA)

Parent Involvement (Set Aside)

Professional Development (Set Aside)

Administration (Set Aside)

(Formulas for determining the amount for parent involvement, professional Development and Administration are found on the ADE webpage at: www.azed.gov/no-child-left-behind/title-i/private-school-services. It is entitled Formulas with Examples)

SERVING PRIVATE SCHOOL STUDENTS



Consultation prior to delivery of services is crucial to services being provided to private school students.

Consultation is Foundational to Services

Consultation

Timely – before LEA decisions are made
(Continue throughout the year)

Meaningful

With all schools where students have been identified as residing within the LEA even those private schools outside LEA's attendance area

Sign and submit Affirmation of Consultation Yearly

Consultation is Foundational to Services

Consultation Topics (Responsibility of the LEA)

How and when decisions on delivery of services to be made

How children's needs to be determined

What services to be offered

How, where and by whom services offered

*** How services will be assessed and improved based upon assessment results

Consultation is Foundational to Services

Consultation Topics (con'd)

Size and scope of services

Services to be provided to teachers and families of participating private school children

Utilization of a third party to provide services

(The LEA has the final decision on use of a third party provider. If LEA decides not to utilize a third party provider, the LEA must provide written notice of the reason that a third party provider is not utilized for services.)

Allocation of funds for services

Consultation is Foundational to Services

Consultation Topics (con'd)

Third party may serve as the authorized representative to conduct the consultation but this needs to be accepted/approved by the LEA

(See applicable Affirmation of Consultation form)

If third party provider is chosen to provide services be aware that they may provide Title I services only and LEA is still responsible for eligible services for other Federal programs namely Title II, Title III, 21st Century, etc.

Evaluation of Program



Program Evaluation

Evaluation of Program

Evaluation

Responsibility of LEA

May work in consultation with third party provider to evaluate program

Conducted at least annually

Does not place unnecessary burden on private school

May be similar but does not have to be identical to evaluation that the LEA uses for its own programs

Results of assessments are to be used to modify and improve Title I Services

Evaluation of Program

Evaluation – Considerations but not Requirements

Academic achievement of students

**Objective assessments,
Does not have to be AIMS
Pre or post assessments**

Parent Input

Title I Teacher Input

Regular Education Teacher Input

Private School Administrator Input

EVALUATION OF PROGRAM

What happens if a student does not make progress?
(Does student need special education evaluation and services?)

How are parent involvement and professional development activities evaluated?

What revisions to program need to occur?

For Cycle 4 monitoring requirements – provide the process of evaluation of services of participating students, teachers and parents

- Who, what, when, how, how often

Third Party Contract Guidance

Contractual agreement (possibly an IGA) governs the relationship of LEA to Third Party Contract

LEA must assure that third party contractor administers the program in accordance with all applicable statutes and regulations

Highly Qualified personnel requirements only apply to teachers who are directly employed by the LEA.

Third Party Contract Guidance

Section 443(e) of General Education Provisions Act requires sub recipients to maintain records that fully disclose:

- How funds were used

- Total cost of the activity for which funds were used

- Other records that will facilitate an effective audit.

 - (This may include administrative costs of the third party.)

Third Party Contract Guidance

Administrative Costs

Expenditures must be reasonable and necessary.

LEA may not use funds allocated for instructional services for parent involvement, professional development or administrative costs of third-party contractor. These are separate allocations.

Expenditures may include but not limited to salaries, office rent, utilities, office equipment, professional development for teachers and contractor's fee (profit.)

Title II – A

Services to private schools within attendance areas only.

Private school teachers must receive professional development opportunities that are equitable to the professional development opportunities received by public school teachers.

Title III

ENGLISH LANGUAGE ACQUISITION, LANGUAGE ENHANCEMENT, and ACADEMIC ACHIEVEMENT

- Help for limited English proficient (LEP) children to attain English proficiency and meet the same standards as all children are expected to meet.
 - ELL students must be identified by private school staff and tested by LEA instructor.
 - LEA must provide:
 - High Quality language instruction for private school ELL students.
 - High Quality professional development for private school teachers.

Resource Information

- *Ensuring Equitable Services to Private School Children: A Title I Resource Tool Kit.*
www2.ed.gov/programs/titleiparta/ps/titleitoolkit.pdf
- *Elementary and Secondary Education Act of 1965, (ESEA) as amended, Section 9501 (Title IX, Part E Uniform Provisions):* <http://www2.ed.gov/policy/elsec/leg/esea02/index.html>
- Education Department General Administrative Regulations 34 Code of Federal Regulations 76- *For regulations on state administered programs, see parts 76 and 80 of EDGAR*
<http://www2.ed.gov/policy/fund/reg/edgarReg/edgar.pdf>
- *Equitable Services Guidance: Guidance on implementing equitable services for private school students and teachers for those programs governed by the Title IX uniform provisions under the Elementary and Secondary Education Act. (March 2009)*
<http://www2.ed.gov/policy/elsec/guid/equitableserguidance.doc>

Contact Information

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ADE website link for Private School Services:

<http://www.azed.gov/no-child-left-behind/title-i/private-school-services/>

COMPLAINT PROCESS

A private school official shall have the right to complain to the State Educational Agency that the LEA did not engage in a meaningful and timely consultation or did not give due consideration to the views of the private school official.

Title I, Part A, Section 1120 (b)

PROVISIONS REQUIRE ~ Continued

- **Eligibility for services**

Title I – Student(s) must **RESIDE** in a Title I attendance area and must be **academically at risk**. Poverty is NOT a criterion for receiving Title I, Part A services

Student selection for Title I services include:

- Multiple measures
- Educationally related criteria
- Developmentally appropriate criteria

Other Title services - provided for private school students/teachers/families based on total private school **ENROLLMENT**

- **Equitable participation** not necessarily identical to the LEA's program (Based on needs)

PROVISIONS REQUIRE ~ Continued

- **Eligibility for services**

Title I – Student(s) must **RESIDE** in a Title I attendance area and must be **academically at risk**. Poverty is NOT a criterion for receiving Title I, Part A services

Student selection for Title I services include:

- Multiple measures
- Educationally related criteria
- Developmentally appropriate criteria

Other Title services - provided for private school students/teachers/families based on total private school **ENROLLMENT**

- **Equitable participation** not necessarily identical to the LEA's program (Based on needs)

Title I-A

IMPROVING ACADEMIC ACHIEVEMENT OF THE DISADVANTAGED

- LEA must provide a Title I program to private school children, employing methods and instructional strategies for improving academic achievement that have been shown to be effective through scientifically based research.
- Program must supplement and coordinate with the instruction that the private school children are receiving in their regular classrooms.
- The program should complement the classroom instruction and should not be a separate instructional program.

Title I-A

IMPROVING ACADEMIC ACHIEVEMENT OF THE DISADVANTAGED

Grade Span Groupings

- The LEA must provide Title I services to eligible private school students reflecting the grade span of the public school.
 - For example: if an LEA provides a Title I program only in first grade within a K-5 public school; eligible private school students may be in grades K-5.
- The program does NOT have to be identical to the public school program.

Title I-A

IMPROVING ACADEMIC ACHIEVEMENT OF THE DISADVANTAGED

- Program Options
 - Subject area and grade levels
 - Pull-out during day (cannot be an in-class model)
 - Extended day
 - Summer school

- Types of Services - include, but are not limited to:
 - Instruction
 - Family literacy
 - Early childhood
 - Counseling
 - Take home computers
 - Computer-assisted instruction
 - Combination of services listed above

Title I Non-Regulatory Guidance B-37

Title I LEA Program Set-Aside Summer School Program

Equitable summer school services must be provided to private school students if Title I set-aside funds are used to provide a district summer school program.

Note:

If a public school was a Non-Title I school during the school year, however a public school student from that school attends the district's summer school program...then equitable summer school services must be offered to the private school within that public school's boundaries even though no Title I services would have been offered to those private school students during the school year.

If private school officials and/or the private school student's parent(s) do not want their child to attend summer school on "public school property", then other accommodations must be made.

OFFER TO PARTICIPATE

On an annual basis the LEA must contact private school officials and inquire if private school students and teachers will participate in the Federal programs available to them.

INTENT TO PARTICIPATE FORM

This is NOT an Affirmation of Consultation

- Form might include:
 - Description of LEA programs offered
 - Area to check for which programs the private school might want services
 - Request for:
 - enrollment data
 - # of low-income families
 - # of LEP students
 - Other documentation to demonstrate needs

TIMELY AND MEANINGFUL CONSULTATION

To ensure timely and meaningful consultation, an LEA must consult with appropriate private school officials prior to the LEA making any decision that affects the opportunities of eligible private school children to participate.

SEC. 1120(b)(2)

CONSULTATION

At a minimum, consultation must address:

- How children's needs will be identified
- What services will be offered
- How and when decisions about the delivery of services will be made.
- How where and by whom services will be provided
- How services will be assessed and improved based upon assessment results
- Size and scope of equitable services

CONSULTATION ~ Continued

At a minimum, consultation must address:

- Proportion of funds allocated for services
- Method for determining poverty data (Title I only)
- Equitable services to teachers and parents
- Thorough analysis of the views of private school officials regarding third-party contractor
- Written explanation by the LEA *if* the LEA disagrees with the private school officials on the use of a third-party contractor.

AFFIRMATION OF CONSULTATION

- Both LEA and private school administrators sign the form
- Indicate under which Titles private school students/teachers/families will receive service
- LEA submits a form to ADE for each private school within its boundaries

TIMELY AND MEANINGFUL CONSULTATION ~ Continued

- Consultation between LEA and private school officials must occur during the design, development, and implementation of the program.
- Meetings [consultations] shall continue throughout the implementation and assessment of services.

TIMELY AND MEANINGFUL CONSULTATION ~ Continued

Affirmation of Consultation form may be found on the:

- Title I Document Library
- Private School Services
- In Grants Management Enterprises through ADE Connect logon, available 7/1/14

DELIVERY OF SERVICES

Service delivery options include:

- Direct services from LEA of residence
- Through a third party contractor (*administrative costs must be charged as 200.77F, NOT from instructional funds*)
- Another LEA

The Responsibilities of Private School Officials

- Be available for consultation
- Provide poverty data
 - *Only include:*
 - *Address*
 - *Grade Level/ages*
 - *NO Names*
- Provide a list of academically at-risk children
 - *Include:*
 - *Names*
 - *Addresses*
 - *Grade level/ages (LEA will select most at risk students)*
- Provide space – if available
- Provide suggestions for program

LEA Maintains Control

LEA retains control of:

- Funds
- Materials
- Equipment
- Property



Mark by Title fund & as property of LEA

Keep inventory list per Title

CARRYOVER

- Benefits for private school children should be provided in a timely manner Sec. 1120(a)(3)
- If the LEA begins Title programs late
 - Additional services should be provided during the remainder of the year...AND
 - Any unspent funds that should have been used to provide equitable services for private school students and add them to the instructional funds for private school participants for the next year.

Title I Non-Regulatory Guidance B-39

“There is similar guidance on this matter for the other programs requiring equitable participation”.

Maureen Dowling, Ed. D. Office of Non-Public Education U.S. Department of Education

EQUITABLE SERVICES FOR CHILDREN ENROLLED IN PRIVATE SCHOOLS

Elementary and Secondary Act of 2001

- Title I, Part A, Section 1120
- Title V, Part A, Section 5142
- Title IX, Part E, Section 9501

Private School Participation

<http://www.azed.gov/no-child-left-behind/title-i/private-school-services/>

Title I-A

Parent Involvement, PD and ADMIN Funding

<i>Title I Services to Private Schools:</i>	NCLB	ARRA
Equitable portion of funds for parent involvement:	\$5000	\$500
Equitable portion of funds for professional development:	\$1000.00	\$500
Equitable portion of funds for administrative activities:	\$5000.00	\$200

Title I Formula – Funding Administration

Multiple Ways to Determine Administration Costs

Determine number of hours to administer the program

Percentage of total time to administer all of Title I Program

Maricopa County Consortium Fee

Title I Formula – Funding Parent Involvement

- Take the PI amount determined from the GROSS Title I-A allocation (\$500)
- Use low-income public (i.e. 1,000 students) and low-income private school students (i.e.: 100 students) **residing** in the Title I attendance area to determine a proportion of reserve.
- 100 (Private school students from low-income families) divided by 1,100 (Total number of students from low-income families) = 9% (proportion of reserve)
- 9% (proportion of reserve) X \$500 (Amount of District's Title I set aside for Parental Involvement) = \$45 Amount of parental involvement funds for private school parents of Title I students.

Title I Formula – Funding Professional Development

- Take the PD amount determined from the GROSS Title I-A allocation (\$2,500)
- Use low-income public (i.e. 1,000 students) and low-income private school students (i.e.: 100 students) **residing** in the Title I attendance area to determine a proportion of reserve.
- $\frac{100 \text{ (Private school students from low-income families)}}{1,100 \text{ (Total number of students from low-income families)}} = 9\% \text{ (proportion of reserve)}$
- $\frac{9\% \text{ (proportion of reserve)}}{\text{District's Title I set aside for Professional development}} \times \$2,500 \text{ (Amount of professional development funds for private school teachers that work with Title I students)} = \225

<http://www.azed.gov/no-child-left-behind/title-i/private-school-services/>